



1111 S 103<sup>rd</sup> St.  
Omaha, NE 68124

REC'D

AUG 28 2010

APCO

August 24, 2010

Mr. Vic Cooper  
Chief, Air Permit and Compliance Section  
Kansas Department of Health and Environment  
1000 SW Jackson St., STE 310  
Topeka, KS 66612-1366

**Re: Reciprocating Internal Combustion Engine (RICE) MACT Initial Notification**

Dear Mr. Cooper:

Northern Natural Gas (Northern) is submitting the initial notification for a dual fueled compressor engine at Northern's Cunningham compressor station. The unit (EU-C6) is fueled with 6% diesel fuel on an energy equivalent basis. Therefore, an initial notification is being submitted for the unit as a non-emergency compression ignited reciprocating internal combustion engine. By the compliance date of May 3, 2013, Northern will either remove the unit from service or install the proper emission controls to fully comply with the requirements.

In addition, Northern is submitting the initial notifications for two diesel fired electrical generator engines at Northern's Macksville and Tescott compressor stations. The units are existing diesel fired engines. Therefore, initial notifications are being submitted for the two units and the engines will be classified as "Emergency Use" by the compliance date of May 3, 2013.

If you should require additional information or if you have any questions, please call me at (402) 398-7716.

Sincerely,

Greg Ammon  
Manager - Environmental

Cc: Director, Air, RCRA and Toxics Division – EPA Region VII  
Mr. Steve Mitchell – NNG

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## Initial Notification of Applicability<sup>b</sup>

National Emission Standards for Hazardous Air Pollutants:  
Stationary Reciprocating Internal Combustion Engines  
**40 CFR Part 63 Subpart ZZZZ**

☒ Yes, I am subject to 40 CFR Part 63 subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

NAICS code(s): 486210

Compliance Date: ☒ Existing source: May 3, 2013 ☐ New/reconstructed source: upon initial startup

**Note: The May 3, 2013 compliance date for existing sources applies to the following engine types:**

- Existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions
- Existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions
- Existing stationary CI RICE located at an area source of HAP emissions

Company name: Northern Natural Gas

Facility name (if different): Cunningham Compressor Station

Facility (physical location) address: 20307 NE 150th Ave. Cunningham, KS 67035

My facility is a (please choose one): ☒ Major source ☐ Area source  
☐ Synthetic minor

<sup>a</sup> This is an example of the type of information that must be submitted to fulfill the Initial Notification of Applicability Status requirement of 40 CFR 63, subpart ZZZZ. You may submit the information in another form or format, or you may use this form.

<sup>b</sup> Initial Notification is due 120 days after the effective date of the rule or 120 days after you become subject to the rule

Owner name/title: Royce A. Ramsay Vice President - Operations

Owner/company address: 1111 S 103<sup>rd</sup>. St. Omaha, NE 68124

Owner telephone number: (402) 398-7989

Owner email address (if available): royce.ramsay@nngco.com

If the Operator information is different from the Owner, please provide the following:

Operator name/title: \_\_\_\_\_

Operator telephone number: \_\_\_\_\_

Operator email address (if available): \_\_\_\_\_

I hereby certify that the information presented herein is correct to the best of my knowledge.

Royce A. Ramsay  
(Signature)

08/12/10  
(Date)

**Royce A. Ramsay Vice President – Operations**  
(Name/title)

**(402)\_389-7989**  
(Telephone No.)